

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 22cr10088
)	
v.)	Violation:
)	
HERBY PAUL,)	<u>Count One:</u> Felon in Possession of
)	Firearm and Ammunition
Defendant)	(18 U.S.C. § 922(g)(1))
)	
)	<u>Forfeiture Allegation:</u>
)	(18 U.S.C. § 924(d); 28 U.S.C. § 2461(c))
)	

INDICTMENT

COUNT ONE

Felon in Possession of Firearm and Ammunition
(18 U.S.C. § 922(g)(1))

The Grand Jury charges:

On or about November 24, 2021, in Canton, in the District of Massachusetts, the
defendant,

HERBY PAUL,

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a
term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and
ammunition, that is, one Taurus G3C 9 millimeter semiautomatic handgun, serial number
ABM228518, and 13 rounds of 9 millimeter ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

FIREARM FORFEITURE ALLEGATION
(18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c))

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 922, set forth in Count One, the defendant,

HERBY PAUL,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing commission of the offense. The property to be forfeited includes, but is not limited to, the following:

- a. one Taurus G3C 9 millimeter semiautomatic handgun, serial number ABM228518; and
- b. 13 rounds of 9 millimeter ammunition.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;


it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461.

A TRUE BILL



FOREPERSON



CHARLES DELL'ANNO
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: APRIL 26, 2022
Returned into the District Court by the Grand Jurors and filed.

/s/ Dawn M. King 1:16pm

DEPUTY CLERK